

**Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

OVE WILLIAM AKERBLOM,

Plaintiff,

v.

EZRA HOLDINGS LIMITED, EZRA  
ENERGY SERVICES PTE LTD, EMAS  
OFFSHORE LIMITED, EMAS SUBSEA  
SERVICES, LLC, and LEE CHYE TEK  
LIONEL a/k/a LIONEL LEE,

Defendants.

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CIVIL ACTION

NO. 4:11-cv-00694

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DECLARATION OF LEE CHYE TEK LIONEL

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Pursuant to 28 U.S.C. § 1746, I, Lee Chye Tek Lionel, declare as follows:

1. My name is Lee Chye Tek Lionel. I have personal knowledge of all of the facts stated herein, all of which are true and correct.
2. All of the facts stated in my February 26, 2011 Declaration on file in this cause were true when made, remain true today, and are incorporated herein by reference.
3. I voluntarily consent to the jurisdiction of the courts of Singapore with respect to this action, and waive any available jurisdictional defenses concerning that forum. Toward that end, I am willing to accept service of process in either the United States or Singapore requiring my appearance in a Singaporean court to respond to the claims raised herein. Furthermore, I have appointed Messrs Allen & Gledhill, a firm of solicitors in Singapore, to accept service of process on my behalf in Singapore.
4. All of my actions, if any, complained of in this cause were taken on behalf of Ezra Holdings Limited ("EHL") and its subsidiary entities. In order to properly defend against the claims asserted, I would need to call several

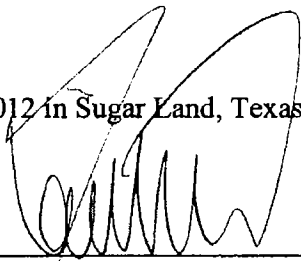


officers and employees of EHL and its subsidiary entities who are Singaporean citizens, and/or maintain their permanent residence in Singapore. I would also need to bring various document files that are kept in hard copy form at the companies' respective principal offices in Singapore. Specifically, defending this lawsuit will likely require the testimony of and/or information contained in the following:

- (a) testimony of Mr Adarash Kumar, Mr Dominic Koay and Mr Tay Chin Kwang concerning Mr Ove Akreblom's failure to manage IGPL and/or deliver to the management of EHL; and
  - (b) information contained in the documents, books and accounts of EHL, Ezra Energy Services Pte Ltd, Intrepid Global Pte Ltd ("IGPL") and various other EHL subsidiaries, pertaining to the transactions involving IGPL, the purchase of IGPL and the expenses incurred by EHL to support the operations of IGPL.
5. Applications for Singaporean travel visas and Employment Passes are received, reviewed, and either accepted or denied by the Immigration & Checkpoints Authority and the Ministry of Manpower respectively, both Singaporean government agencies. I have neither the ability nor the desire to impede any United States citizen's application for a travel visa to Singapore or application for Employment Pass, including any present or future application of Mr. Ove William Akerblom.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Signed this 9<sup>th</sup> day of February, 2012 in Sugar Land, Texas.



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Lee Chye Tek Lionel